



**DIVISION OF  
ENFORCEMENT**

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
100 F STREET, N.E.  
WASHINGTON, D.C. 20549

**DEVON LEPPINK STAREN  
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March 9, 2022

**VIA ECF**

The Honorable Cathy L. Waldor  
United States Magistrate Judge  
United States District Court  
District of New Jersey  
Martin Luther King Building Courthouse  
50 Walnut Street, Room 4040, Courtroom 4C  
Newark, NJ 07101

Re: SEC v. Vuuzle Media Corp., et al.; Case No. 2:21-cv-01226 (D.N.J.)

Dear Judge Waldor:

Pursuant to your Text Order on March 7, 2022 (Dkt. No. 97), attached is a draft protective order containing the terms as to which the U.S. Securities and Exchange Commission and Defendant Vuuzle Media Corp. are in agreement.

Respectfully Submitted,

/s/ Devon Leppink Staren  
Devon Leppink Staren  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549  
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202-772-9244 (facsimile)  
[starend@sec.gov](mailto:starend@sec.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2022, I served a copy of the foregoing upon all counsel of record using this Court's ECF system, and upon Defendant Flynn using the email rflynn48@gmail.com.

/s/ Devon Staren  
Counsel for Plaintiff